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Honorable John P. Cronan  
United States District Judge  
Southern District of New York  
500 Pearl Street, Room 1320  
New York, NY 10007

RE: Request for extension of time to file a response  
*Gartenberg et al v. The Cooper Union for the Advancement of Science and Art*  
1:24-cv-02669-JPC

Dear Judge Cronan:

Our Firm represents The Cooper Union for the Advancement of Science and Art (“Cooper Union”) in the case referenced above. Plaintiffs filed their complaint seeking injunctive and monetary relief against Cooper Union on April 9, 2024. On April 10, 2024, the Clerk of Court issued summons, and process was served on Cooper Union on the same day. Pursuant to Rule 12 of the Federal Rules of Civil Procedure (“FRCP”), a response is currently due on May 1, 2024. Pursuant to FRCP Rule 6(b), Cooper Union respectfully requests that the time to answer, move or otherwise respond be extended by thirty days, through and including May 31, 2024. Counsel for Plaintiffs, Aaron Stiefel, has informed me that Plaintiffs do not object to this request.

This is Cooper Union’s first request for an extension of time to file a response. Good cause exists for extending time. In the complaint, Plaintiffs raise several complex claims based on events that transpired on Cooper Union’s campus in October 2023 and in the aftermath of those events. Cooper Union’s response to the allegations and claims will require sufficient time to gather pertinent information about those events from relevant administrators, faculty, staff members and other parties. Based on the information gathered about the events at issue in the complaint, Cooper Union would be in a better position to consider its pleadings and assess whether motion practice rather than an Answer might be an appropriate response. A brief extension of time would enable Cooper Union to prepare a response that would be most helpful to the Court. The extension is not likely to delay the resolution of this complaint.

Accordingly, Cooper Union respectfully requests that the time for filing a response to the complaint be extended by thirty days, through and including May 31, 2024.

Respectfully submitted,

*/s/ Lisa E. Cleary*

Lisa E. Cleary

cc: All counsel of record (via ECF and email)